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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MENOTTI ENTERPRISE, LLC,

Debtor.

Chapter 11 (Subchapter V)

Case No.: 24-22242-SHL

**NOTICE OF MOTION BY ADP TOTALSOURCE, INC.
FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that a hearing on the motion by ADP TotalSource, Inc. (“TotalSource”) for relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code and Bankruptcy Rule 4001(a)(3) (the “Motion”) will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, Courtroom 701 of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601 (“Bankruptcy Court”) on _____ at 10:00 a.m. (Eastern time) (the “Hearing”), or soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that the Hearing on the Motion will be conducted on Zoom for government.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds supporting same, and must be filed

electronically with the Bankruptcy Court in accordance with Local Bankruptcy Rule 5005-2 (Local Bankruptcy Rule 5005-2 User Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system and by all other parties in accordance with Local Bankruptcy Rule 5005-1, and must be served upon i) counsel to TotalSource, Scarinci Hollenbeck, 150 Clove Road, 9th Floor, Little Falls, NJ 07424, attn: David Edelberg (dedelberg@sh-law.com); ii) counsel to the debtor, Ortiz & Ortiz, LLP, 287 Park Avenue South, Suite 213, New York, NY 10010, attn: Norma E. Ortiz, Esq.; iii) the Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, NY 10004, attn: Mark Bruh, Esq.; and iv) Lindenwood Associates, LLC, 328 North Broadway, 2nd Floor, Upper Nyack, NY 10960, attn: Nat Wasserstein, Subchapter V Trustee.

PLEASE TAKE FURTHER NOTICE that, if no objections to the Motion are timely filed and served, TotalSource may, on or after the objection deadline, submit to the Bankruptcy Court an Order substantially in the form of the proposed order annexed to the Motion as Exhibit A, which order may be entered with no further notice or opportunity to be heard.

Dated: Little Falls, New Jersey
April ____, 2024

SCARINCI & HOLLENBECK, LLC
Attorneys for ADP TotalSource, Inc.

By: /s/ David Edelberg
DAVID EDELBERG, ESQ.